

AO 91 (Rev. 11/11) Criminal Complaint

**FELONY**  
**UNITED STATES DISTRICT COURT**  
 for the  
 Southern District of Texas

United States Courts  
 Southern District of Texas  
 FILED  
 March 14, 2025

Nathan Ochsner, Clerk of Court

United States of America )

V. )

Case No. 1:25-MJ-214

Ezequiel Hernandez )

Jesus Perez )Marco Estrada-Hernandez )

Defendant(s) )

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 13, 2025 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

*Code Section*

Title 21, United States Code, Section 841(a)(1) & Title  
 21, United States Code, Section 846

*Offense Description*

Knowingly and intentionally possess with intent to distribute 21.04 kilograms of cocaine, a Schedule II, Title II, drug of the Controlled Substance Act. Furthermore, the defendant did knowingly and intentionally conspire and agree with persons known and unknown to unlawfully possess with intent to distribute 21.04 kilograms of cocaine.

This criminal complaint is based on these facts:

On March 13, 2025, Homeland Security Investigations (HSI) agents conducted surveillance operations in Olmito, Texas on a tractor trailer lot that was reported that illicit activities involving narcotics were being conducted. A Cameron County Sheriff's Office Deputy (CCSO) conducted a vehicular traffic stop of a GMC Sierra exiting the truck lot and identified the driver as Jesus PEREZ. CCSO deployed a narcotics K9, which alerted to the presence of a trained odor. CCSO conducted a detailed search of the vehicle and found twenty (20) rectangular shaped bricks, tightly wrapped in black electrical tape, concealed in a cardboard box in the bed of the GMC Sierra. The total approximate weight of the bricks was 21 kilograms. A field test of the white powdery substance inside the bricks, tested positive for the properties of cocaine. Agents continued surveillance on the lot and noticed the white F-150 pickup truck leaving the lot and conducted an investigative stop and identified Ezequiel HERNANDEZ and a commercial truck driver named Marco Antonio ESTRADA-HERNANDEZ. In a post-Miranda interview, the subjects admitted to their involvement in the narcotics smuggling event and distribution for monetary gain.



Continued on the attached sheet.

  
 Complainant's Signature

Fidel Elizondo, HSI Special Agent

Printed name and title

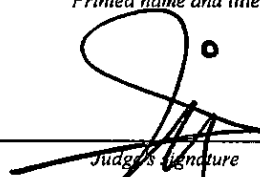
Submitted by reliable electronic means, sworn to and signature attested  
 as per Fed. Rules Cr. Proc. 4.1

March 14, 2025

Date

Brownsville, Texas

City and State

  
 Judge's Signature

Ignacio Tortosa, III U.S. Magistrate Judge

Printed name and title